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**August 31, 2015**

**Via ECF**

Hon. Katherine P. Failla, USDJ  
United States District Court, SDNY  
40 Foley Square, Room 2103  
New York, NY 10007  
Tel: 212-805-0290

**Re: Geoffery Tillman v. Verizon Communications Inc. et al.**  
**Case #: 15-CV-4086 (KPF)**  
**Motion to Reopen Case**

Dear Judge Failla:

My firm represents plaintiff in the above-referenced action, and I respectfully write with the consent of all parties, and pursuant to the Court's July 30, 2015 order, to request a thirty-day extension of the deadline for the parties to reopen or file a stipulation of dismissal in this case. The parties need the additional time to finalize the settlement agreement.

We thank the Court in advance for its time and consideration.

Respectfully submitted,

Abdul Hassan Law Group, PLLC

/s/ Abdul Hassan  
By: Abdul K. Hassan, Esq. (AH6510)  
*Counsel for Plaintiff*

**cc: Defense Counsels via ECF**